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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

KEITH THOMAS, RICHARD HAYES, HERB  
SMITH, and OKLAHOMA POLICE PENSION &  
RETIREMENT SYSTEM,

Plaintiffs,

v.

MAGNACHIP SEMICONDUCTOR CORP. SANG  
PARK, TAE YOUNG HWANG, MARGARET  
SAKAI, R. DOUGLAS NORBY, ILBOK LEE,  
NADER TAVAKOLI, RANDAL KLEIN,  
MICHAEL ELKINS, AVENUE CAPITAL  
MANAGEMENT II, L.P., BARCLAYS CAPITAL  
INC., DEUTSCHE BANK SECURITIES INC.,  
CITIGROUP GLOBAL MARKETS INC., UBS  
SECURITIES LLC and NEEDHAM & COMPANY,  
LLC,

Defendants.

CASE NO.: 3:14-cv-01160-JST

STIPULATION AND ~~PROPOSED~~  
ORDER AMENDING PLAINTIFFS'  
PAGE LIMIT FOR THEIR  
OPPOSITIONS TO DEFENDANTS'  
MOTIONS TO DISMISS THE THIRD  
AMENDED COMPLAINT

WHEREAS, pursuant to the Court's May 7, 2015 Order Granting Defendants' Motion for Order Enlarging Time (the "May 7 Order") and the Court's June 15, 2015 Order Re Motion to Coordinate and Partially Consolidate a Related Action, Lead Plaintiff Keith Thomas and plaintiffs Richard Hayes, Herb Smith, and Oklahoma Police Pension & Retirement System ("Plaintiffs") filed the Third Amended Complaint for Violations of the Federal Securities Laws on June 26, 2015;

WHEREAS, pursuant to the May 7 Order, Defendants filed the following four motions to dismiss on July 27, 2015:

- Defendants MagnaChip Semiconductor Corp., R. Douglas Norby, and Ilbok Lee's Motion to Dismiss Plaintiffs' Third Amended Complaint and Memorandum of Points and Authorities in Support Thereof;
- Defendants Michael Elkins, Randal Klein, and Avenue Capital Management II. L.P.'s Motion to Dismiss Plaintiffs' Third Amended Complaint and Memorandum of Points and Authorities in Support Thereof;
- Defendant Nader Tavakoli's Motion to Dismiss Plaintiffs' Third Amended Complaint and Memorandum of Points and Authorities in Support Thereof; and
- Underwriter Defendants' Motion to Dismiss the Third Amended Complaint and Memorandum of Points and Authorities in Support Thereof

WHEREAS, pursuant to the Court's May 7 Order, Plaintiffs' opposition briefs must be filed by September 25, 2015;

WHEREAS, pursuant to Local Civil Rule 7-3(a), Plaintiffs are permitted to file an opposition brief of 25 pages to each of Defendants' four motions for a total of 100 pages;

NOW, THEREFORE, it is hereby stipulated and agreed by the undersigned counsel as follows:

STIPULATION AND ~~PROPOSED~~ ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT



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1 *I, Michael J. Wernke, am the ECF User whose ID and password are being used to file this*  
2 *STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR*  
3 *THEIR OPPOSITIONS TO DEFENDANTS' MOTIONS TO DISMISS. In compliance with Civil*  
4 *L.R. 5-1(i)(3), I hereby attest that the signatories below have concurred in this filing.*

5  
6 DATED: September 21, 2015

7 **POMERANTZ LLP**

8 /s/ Michael J. Wernke

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STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO  
DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT

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*Attorney for Defendants*

*Barclays Capital Inc.; Citigroup Global*

*Markets Inc.; Deutsche Bank Securities Inc.;*


*Needham & Company, LLC; UBS Securities*

*LLC*

*\*Admitted pro hac vice*

1 **IT IS SO ORDERED.**

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3  
4 Dated: September 21, 2015

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Honorable Jon S. Tigar  
United States District Judge

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